

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

|                           |   |                        |
|---------------------------|---|------------------------|
| UNITED STATES OF AMERICA, | ) | Cr. No. 05-00027SOM-03 |
|                           | ) |                        |
| Plaintiff,                | ) | DECLARATION OF COUNSEL |
|                           | ) |                        |
| vs.                       | ) |                        |
|                           | ) |                        |
| ZULEIKA CARTER,           | ) |                        |
| a.k.a. Laaka              | ) |                        |
| Defendant.                | ) |                        |
|                           | ) |                        |
|                           | ) |                        |
|                           | ) |                        |

**DECLARATION OF COUNSEL**

I, PAUL J. CUNNEY, hereby declare as follows:

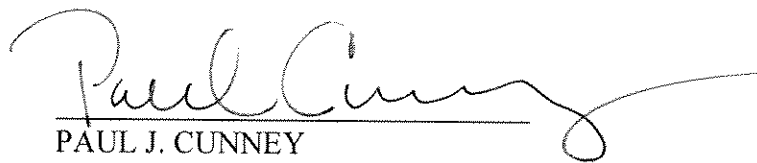
1. That I am counsel for defendant, ZULEIKA CARTER, and I am appearing Pro Bono.
2. That the facts and statements set forth in the foregoing document are true and correct to the best of my knowledge and belief.
3. That for a period of three (3) weeks defendant has not keep in contact with Declarant's office;
4. That Declarant's office has attempted to contact her by phone and leaving numerous messages at her home and cell phone;
5. That the communication between Declarant and Defendant is non-existent;
6. That the Attorney-Client relationship between Declarant and Defendant is

irretrievably broken down and Declarant truly believes that he would be ineffective as defendant's attorney if he is not allowed to withdraw.

7. Consequently, Declarant respectfully request that this honorable Court grant Declarant's motion to withdraw as counsel pursuant to Hawaii Rules of Professional Conduct Rule 1.16 (4), 1.16 (5), and 1.16 (6).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING  
IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED: Honolulu, Hawaii, January 24, 2006.



PAUL J. CUNNEY  
Attorney for Defendant  
ZULEIKA CARTER